

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

THE SHERWIN-WILLIAMS COMPANY	)	CASE NO. 1:18 CV 01972
	)	
	)	
	)	JUDGE GAUGHAN
	)	
v.	)	
	)	<u>PLAINTIFF'S COMBINED MOTION FOR</u>
PRISTINE COLLISION CENTER,	)	<u>A DEFAULT JUDGMENT AGAINST</u>
LLC, et. al.	)	<u>DEFENDANTS PRISTINE COLLISION</u>
	)	<u>CENTER, LLC AND MARK A. PEREZ,</u>
	)	<u>AND MOTION TO FILE THE CONTRACT</u>
	)	<u>UNDER SEAL.</u>

Now comes Plaintiff, pursuant to Civil Rule 55, and hereby moves the Court for a default judgment against Defendants Pristine Collision Services, Inc. and Mark A. Perez in the amount of \$318,795.00. An affidavit establishing the breach of contract and Plaintiff's damages, as well as an account exhibit evidencing Defendants' sales history, are attached hereto.

Plaintiff further moves this Court for an order allowing it to file the contract that Defendants breached under seal as it is proprietary in nature and its terms constitute trade secrets. A concise brief in support of this motion is attached hereto.

J. BRIAN KENNEY CO., LPA

s/ J. Brian Kenney  
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